

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TEAMSTERS LOCAL UNION NO. 727)	
HEALTH AND WELFARE FUND,)	
TEAMSTERS LOCAL UNION NO. 727)	
PENSION FUND and TEAMSTERS)	
LOCAL UNION NO. 727 LEGAL AND)	
EDUCATIONAL ASSISTANCE FUND,)	
)	
Plaintiffs,)	
v.)	No. 07 C 6949
)	
AFFILIATED MORTUARY SERVICES,)	Judge Manning
LTD., an Illinois Corp.,)	
)	Mag. Judge Valdez
Defendant.)	

MOTION FOR DEFAULT JUDGMENT

NOW COME the Plaintiffs and move this Honorable Court to enter a default judgment on behalf of the Plaintiffs and against Defendant on the grounds that the Defendant has failed to answer or otherwise defend to the Complaint of the Plaintiffs, a copy of which is attached hereto as Exhibit "A". Said Defendant was served on December 17, 2007, as more fully appears from the Affidavit of Service, a copy of which is attached hereto as Exhibit "B".

WHEREFORE, Plaintiffs request the following relief:

1. That default judgment be entered against the Defendant herein, AFFILIATED MORTUARY SERVICES, LTD., an Illinois Corp., and that the Complaint filed herein be taken as confessed.

2. That judgment be entered forthwith against the Defendant and in favor of Plaintiffs for the period March 1, 2003, through December 31, 2005, in the amount of \$100,856.44.

3. That interest and/or liquidated damages be assessed against the Defendant as provided in the Collective Bargaining Agreement and the applicable provisions of the Pension Reform Act.

4. That the Defendant be ordered to comply with and perform according to the terms and conditions of its Collective Bargaining Agreement and the applicable provisions of ERISA as amended.

5. For such other and further relief as the Court may deem just and proper, including reasonable attorney's fees and court costs which are sustained.

/s/ Robert B. Greenberg
Asher, Gittler, Greenfield & D'Alba, Ltd.
200 West Jackson Boulevard
Suite 1900
Chicago, Illinois 60606
(312) 263-1500
IL ARDC#: 01047558

Dated: May 5, 2008